REMARKS

Reconsideration of the present application is respectfully requested. Claims 1-42, 44-45, 50, 61-62, 65-66, 71 and 82-83 were previously canceled. No claims have been amended, added or canceled in this response.

Claim Rejections

Independent claims 43, 52, 57, 64, 73, and 78 stand rejected under 35 U.S.C. § 103(a) based on Reed et al. (U.S. Patent no. 6,004,205), in view of Brunson et al. (U.S. Patent no. 6,018,762) and Frietas et al. (U.S. 2002/0049858). Applicant respectfully traverses the rejections.

One of the basic requirements of a *prima facie* case of obviousness is that the prior art reference (or references when combined) must teach or suggest <u>all of the claim limitations</u>. MPEP §2143.

Claim 43 recites:

> 43.   A method for operating an electronic mail server system having mailboxes associated with wireless client devices, the method comprising:
>   **receiving input to change an organizational structure of a mailbox;**
>   making a change to the organizational structure of the mailbox in response to the input; and
>   **pushing a message to a wireless client device associated with the mailbox, the message comprising information about the organizational change to the mailbox, wherein the information is used by the wireless client device to synchronize a cached version of the mailbox stored locally in the wireless client device with the mailbox prior to notifying a user of the change to the mailbox.**
> (Emphasis added).

By contrast, Reed and Brunson, individually or in combination, do not teach the above emphasized claim limitations. As explained in the response to the previous office action mailed on 1/18/2006, Reed discloses an automated communications system operating to transfer data,

metadata and methods from a provider computer to a consumer computer through a communication network. Information which changes in the provider computer is automatically updated in the consumer computer through the communications system.

Reed does not teach or suggest receiving input <u>to change an organizational structure of a mailbox</u>. In fact, the Examiner does not contend so, either. However, citing Reed's column 5 lines 5-17, column 29 lines 36-38, column 43 lines 29-40, 44-47 and column 44 lines 14-17, the Examiner alleges that these sections teach or suggest receiving input <u>to change an organizational structure of a database</u> (office action mailed on 7/18/2006, page 3). Applicant analyzed the cited section, but did not find any discussion regarding receiving input <u>to change an organizational structure of a database</u>. Rather, the cited sections disclose changes of the <u>content</u> of a database, not the <u>organizational structure</u> of the database. Specifically, column 5 lines 5-17 discuss notifying users of any new data entry in a database via e-mail. Column 29 lines 36-38 discuss a directory to communication objects in a consumer database. Column 43 lines 29-40 and lines 44-47 discuss metadata describing a control structure. None of the above cited sections teach or suggest receiving input <u>to change an organizational structure of a database</u>, much less receiving input to change an organizational structure <u>of a mailbox</u>, as recited in claim 43.

Reed further does not teach or suggest <u>pushing a message to a wireless client device associated with the mailbox, the message comprising information about the organizational change to the mailbox, wherein the information is used by the wireless client device to synchronize a cached version of the mailbox stored locally in the wireless client device with the mailbox prior to notifying a user of the change to the mailbox</u>. The Examiner alleges that Reed teaches or suggests pushing a message to a wireless client device associated with the <u>database</u>, the message comprising information about the organizational change to the <u>database</u>, wherein the

information is used by the wireless client device to synchronize a cached version of the database stored locally in the wireless client device with the database prior to notifying a user of the change to the database (office action mailed on 7/18/2006, page 3). However, as disclosed in Reed, information being pushed from a provider computer to consumer computers is <u>changes in data</u> stored in a provider database, not <u>changes in organizational structure</u> of the provider database (see Reed's column 9, lines 38-41). Thus, Reed does not even teach or suggest <u>pushing a message to a wireless client device associated with the database, the message comprising information about the organizational change to the database, wherein the information is used by the wireless client device to synchronize a cached version of the database stored locally in the wireless client device with the database prior to notifying a user of the change to the database.</u>

Brunson also does not teach or suggest the above discussed claim limitations. Brunson discloses "a way of synchronizing the <u>contents</u> of commonly-owned mailboxes in disparate messaging systems" (Brunson's Abstract). As disclosed in column 6, lines 1-20, it is the changes of the <u>messages</u> stored in a mailbox that are synchronized, not the <u>organizational changes</u> of the mailbox that are synchronized, such as recited in claim 43. Thus, Brunson also does not teach or suggest the above emphasized limitations of claim 43.

Frietas also does not teach or suggest the above emphasized limitations. Neither does the Examiner contend so.

Thus, at least for the foregoing reasons, the Examiner fails to make a *prima facie* case of obviousness under §103(a). Claim 43 is not obvious based on Reed in view of Brunson and Frietas. Independent claims 52, 57, 64, 73, and 78 recite limitations similar to those in claim 43. Accordingly, these claims are also patentable over Reed, Brunson and Frietas for similar reasons.
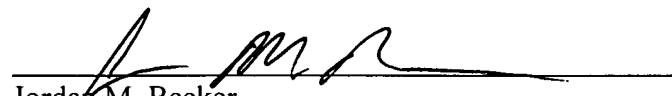
Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,
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